

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DAO HEALTH, a California Corporation,

Plaintiff,

vs.

SHENZHEN LUTEJIANCHENG
TECHNOLOGY CO., LTD., a/k/a SHENZHEN
ROOT E-COMMERCE CO., LTD., a China
Limited Company,

Defendant.

Case No. 1:23-cv-04885

JURY TRIAL DEMANDED

DAO HEALTH’S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rules 5.8 and 26.2, Plaintiff Dao Health (“Dao Health”) respectfully moves this Court for leave to file under seal its Motion For Leave to File a Fourth Amended Complaint (“Motion to Amend”), and the accompanying declaration and exhibits.

The Motion to Amend and supporting materials rely upon documents and information designated “Confidential” or “Highly Confidential” by Defendant. The agreed Protective Order instructs that “[a] party wishing to file under seal a document containing Confidential or Highly Confidential information must move the Court, consistent with Local Rule 26.2(b).” Dkt. 33 ¶ 6(a). In compliance with Local Rule 26.2(c), Dao Health will file a public, redacted version of the Motion to Amend and an unredacted, provisionally sealed version simultaneously with this motion.

Dao Health takes no position as to whether Defendant’s confidentiality designations are appropriate and expressly reserve the right to challenge the confidentiality designations of Defendant.

Dao Health met and conferred with Defendant via email on December 23, 2024, and this

motion is unopposed.

Accordingly, Dao Health respectfully requests that the Court grant this Motion for Leave to File Under Seal its Motion to Amend and supporting materials.

Date: January 6, 2025

Respectfully submitted,

By: /s/ Tanner Laiche

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Attorneys for Plaintiff Dao Health

CERTIFICATE OF SERVICE

I hereby certify that, on January 6, 2025, the foregoing document was filed electronically in compliance with Local Rule 5.9(a), which will provide notice of the same to all counsel of record.

/s/ Tanner Laiche
Tanner Laiche

CERTIFICATE OF CONFERENCE

I certify that the parties met and conferred via email on December 23, 2024, and this motion is unopposed.

/s/ Tanner Laiche
Tanner Laiche